

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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ROSLYN LA LIBERTE, : Civil Action No. 1:18-cv-05398-
Plaintiff, : DLI-VMS
: : ECF Case
: :
-against- :
: :
JOY REID, :
: :
Defendant. :
: :
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MOTION FOR WITHDRAWAL OF COUNSEL

Pursuant to Local Rule 1.4, undersigned counsel Wade, Grunberg & Wilson, LLC, together with its attorneys of record G. Taylor Wilson and Nicole Jennings Wade, respectfully move for leave of Court and an Order permitting their withdrawal from the above matter.

Rule 1.4 requires that such an Order “may be granted only upon a showing by affidavit or otherwise of [1] satisfactory reasons for withdrawal or displacement and [2] the posture of the case, including its position, if any, on the calendar, and [3] whether or not the attorney is asserting a retaining or charging lien.” [Numerical brackets added].

As set forth in the attached Declaration of G. Taylor Wilson, the reason for withdrawal is that Plaintiff Roslyn La Liberte terminated Wade, Grunberg & Wilson, LLC’s representation on September 24, 2020, and directed the firm on September 25, 2020 to seek withdrawal with her consent. Wade, Grunberg & Wilson, LLC was further advised that Ms. La Liberte will continue to be represented by lead counsel L. Lin Wood of L. Lin Wood, P.C. and David Olasov of Olasov, LLP. (*See* Wilson Dec. ¶ 2).

With respect to the posture of the case, on September 25, 2020, the United States Court

of Appeals for the Second Circuit denied Defendant Joy Reid's petition for panel rehearing, or, in the alternative, for rehearing *en banc*. The only matter that remains pending in the Second Circuit is Ms. La Liberte's Itemized and Verified Bill of Costs. There is no scheduling order for the filing of motions or conducting of discovery in this matter, as proceedings herein have not restarted following the Second Circuit's order [Doc. 41], and this matter is not on a trial calendar. (See *id.* ¶ 3).

Finally, Wade, Grunberg & Wilson, LLC intends to assert a charging lien in this matter. (See *id.* ¶ 4).

Wherefore, for good cause shown, G. Taylor Wilson, Nicole Jennings Wade, and their firm, Wade, Grunberg & Wilson, LLC, seek an Order granting this motion for withdrawal as counsel of record for Plaintiff Roslyn La Liberte. A proposed order is attached hereto for the convenience of the Court.

Respectfully submitted this 28th day of September, 2020.

WADE, GRUNBERG & WILSON, LLC

By: /s/ G. Taylor Wilson
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CERTIFICATE OF SERVICE

I hereby certify that on September 28, 2020, the foregoing document was filed with the Clerk of the Court and served in accordance with the Federal Rules of Civil Procedure, and/or the Eastern District's Local Rules, and/or the Eastern District's Rules on Electronic Service upon the following parties and participants (in addition, via e-mail where indicated):

John H. Reichman
Jason Libou
885 Second Avenue, 47th Floor
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Counsel for Joy Reid

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-and-

David Olasov
485 Madison Avenue, 7th Floor
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Counsel for Roslyn La Liberte

Roslyn La Liberte
c/o L. Lin Wood
1180 W. Peachtree St., Ste. 2040
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Also via e-mail to L. Lin Wood, David Olasov and Roslyn La Liberte

This 28th day of September, 2020.

/s/ G. Taylor Wilson
G. Taylor Wilson